

1 **JENNY L. FOLEY, Ph.D., ESQ.**  
2 Nevada Bar No. 9017  
3 E-mail: [jfoley@hkm.com](mailto:jfoley@hkm.com)  
4 **MARTA D. KURSHUMOVA, ESQ.**  
5 Nevada Bar No. 14728  
6 E-mail: [mkurshumova@hkm.com](mailto:mkurshumova@hkm.com)  
7 **HKM EMPLOYMENT ATTORNEYS LLP**  
8 1785 East Sahara, Suite 300  
Las Vegas, Nevada 89104  
Tel: (702) 625-3893  
Fax: (702) 625-3893  
E-mail: [jfoley@hkm.com](mailto:jfoley@hkm.com)  
*Attorney for Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CARLA HENDERSON, An Individual ) CASE NO. 2:18-cv-01728-JAD-PAL  
  )  
  )  
Plaintiff,                         )  
                                       )  
                                       )  
vs.                                 )  
                                       )  
STATE OF NEVADA, ex rel. SOUTHERN )  
NEVADA ADULT MENTAL HEALTH     )  
SERVICES,                            )  
                                       )  
                                       )  
                                       )  
                                       )  
                                       )  
Defendants.                         )  
                                       )

## **STIPULATION AND ORDER TO STAY DISCOVERY**

COMES NOW, the Plaintiff, CARLA HENDERSON (“HENDERSON”), by and through her attorney, JENNY L. FOLEY, Ph.D., ESQ., of the law firm HKM EMPLOYMENT ATTORNEYS LLP, and Defendant, STATE OF NEVADA, ex rel. SOUTHERN NEVADA ADULT MENTAL HEALTH SERVICES, (“DEFENDANT”), by and through its attorney, SUSSANNE M. SLIWA, ESQ., of NEVADA ATTORNEY GENERAL’S OFFICE, and hereby stipulates and agrees as follows:

1       1. During the Early Neutral Evaluation Conference, the parties discussed a partial  
2 resolution. The parties do not have control over the timing or outcome of the discussed  
3 resolution and await for the result. Should the partial resolution come to fruition, the parties  
4 expect to reach a settlement.

5       2. That discovery in the above referenced case be stayed until April 3, 2019. The  
6 reason for the stay is that the Parties hope that a settlement may soon be reached.

7       3. The parties' stipulation for a stay is not intended to have any effect on the  
8 Court's orderly review and disposition of Plaintiff's Amended Complaint (ECF No. 20),  
9 Defendant's Answer to Amended Complaint (ECF No. 22), or any other motions that may be  
10 filed by either party during the stay.

11  
12 Dated this 5<sup>th</sup> day of March, 2019.

Dated this 5<sup>th</sup> day of March, 2019.

13  
14  
15 **HKM Employment Attorneys LLP**

**Nevada Attorney General Office**

16  
17  
18 /s/ Jenny L. Foley  
Jenny L. Foley, Ph.D., Esq.  
Nevada Bar No. 9017  
1785 East Sahara Ave., Suite 300  
Las Vegas, Nevada 89104

19  
20  
21  
22  
23  
24  
25  
26  
27  
28 /s/ Susanne M. Sliwa  
Susanne M. Sliwa, Esq.  
Nevada Bar No. 4753  
555 E. Washington Ave. Suite 3900  
Las Vegas, Nevada 89101

## **ORDER**

The Court having reviewed the foregoing STIPULATION AND ORDER TO STAY DISCOVERY in the above-entitled matter and for good cause appearing therefor,

**IT IS SO ORDERED** that the discovery in the above referenced case stay until April 3, 2019, unless otherwise deemed sooner by Plaintiff and Defense counsel.

**IT IS SO ORDERED** The parties' stipulation for a stay is not intended to have any effect on the Court's orderly review and disposition of Plaintiff's Amended Complaint (ECF No. 20), Defendant's Answer to Amended Complaint (ECF No. 22), or any other motions that may be filed by either party during the stay.

Dated: April 9, 2019

Terry A. Dees  
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted by:  
**HKM Employment Attorneys LLP**

---

*/s/ Jenny L. Foley*

Jenny L. Foley, Ph.D., Esq.  
Nevada Bar No. 9017  
1785 East Sahara Ave, Suite 300  
Las Vegas, Nevada 89104  
*Attorney for Plaintiff*